

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted: March 6, 2015

Finalized: March , 2015

SUBJECT: CAA Full Compliance Evaluation of Sims Metal Management in Providence, RI

FROM: Abdi Mohamoud, Environmental Engineer, Air Technical Unit

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit

TO: File

I Facility Information

- A. Facility Name: Sims Metal Management
- B. Facility Location: 30 Field Point Drive, Providence, RI 02905
- C. Facility Mailing Address: Same
- D. Facility Contacts: Nicholas Cardonas, Facility Manager
(401) 519-9999
Mark Jacobs (on the phone), Regional EH&S Manager
- F. AFS #:

II Background Information

- A. Date of Inspection: January 23, 2015
- B. Weather Conditions: Sunny, Clear; 30 degrees Fahrenheit
- C. US EPA Representative(s): Abdi Mohamoud and Steve Rapp
- D. State Representative(s): None
- E. Federally Enforceable Requirements Covered During the Inspection:

Federally Enforceable Air Pollution Control Regulations that might apply:

- 40 CFR Part 82, Subpart F – concerning ozone depleting substances;

State Regulations (Federally Enforceable)

Rhode Island Air Pollution Control Regulations as applicable, including Regulation 9, Air Pollution Permitting.

- F. Previous Enforcement Actions: A Detailed Facility Report from EPA's Online Tracking Information System (OTIS) indicates that there has been no CAA activity of any kind at this facility in the past.

III Purpose of Inspection

The purpose of this inspection was to evaluate the facility's compliance with applicable Clean Air Act regulations.

IV Facility Description

A. Company/Facility History:

Sims Metal Management (SIMS) owns and operates a metal recycling facility that collects and processes ferrous and non-ferrous scrap metals. The facility is located close to a port terminal. The company leases the space from the port authority.

B. Contact Name and Mailing Address:

Nicholas Cardonas, Facility Manager, ~~assisted the inspectors to conduct this inspection.~~ ~~Mr. Cardonas~~ is the contact person for this facility. The mailing address for is Mr. Cardonas is 30 Field Point Drive, Providence, RI 02905.

C. Working Hours:

The facility operates one shift a day, five days per week, 52 weeks per year. This shift is typically eight hours per day from 6 am to 4:30 pm. SIMS employs 13 people at this location and owns several roll offs and containers.

D. Process Description:

SIMS collects ferrous and non-ferrous metals from various different sources such as municipalities, manufacturers, small business and the public. The collected metals are transported to other SIMS' facilities for further processing.

V Inspection

A. Entry:

EPA inspectors, Steve Rapp and Abdi Mohamoud arrived at the SIMS facility on Field Point Road ("the facility") at 11:15 am. When the inspectors entered, they parked their vehicle inside the SIMS facility fence-line and observed the operation from the parking lot. From this location, the inspectors had an unobstructed line of sight and did not see any smoke emanating from this facility. The inspectors observed a number of truck containers, e.g., "roll-offs," and piles of scrap metal, as well as a large pile of scrap metal being moved around with a large front end loader. See photos in electronic file.

The inspectors were met by ~~facility representative~~ Nicholas Cardonas, facility manager. The inspectors showed their credentials to Mr. Cardonas and then went into the weigh station to talk.

B. Opening Conference:

Mr. Mohamoud indicated that the purpose of the inspection was to evaluate SIMS' compliance with any applicable air pollution regulations. Mr. Mohamoud explained that SIMS may be subject to a variety of regulations including:

- 40 CFR Part 82, Subpart F, federal standards that establishes requirements for the service, maintenance, repair and disposal of appliances containing ozone-depleting refrigerant;
- Rhode Island Air Pollution Control Regulations as applicable, including Regulation 9, Air Pollution Permitting

Mr. Cardonas telephoned Mr. Jacobs who is located at SIMS' regional office in New Haven, CT. Mr. Mohamoud asked Mr. Cardonas and Mr. Jacobs if SIMS accepts and handles equipment (e.g., refrigerators, air conditioning (AC) window units, and automobiles) that contain ozone depleting substances (ODS), including refrigerants such as Freon, and if so, ~~if does~~ SIMS uses its own equipment or a contractor to evacuate the ODS. Mr. Cardonas said that the facility does not own a recovery machine nor does it employ a certified technician. ~~However, h~~He said explained that SIMS does not receive AC window and refrigerators units at this location~~-, as the sign at the weigh station indicated (see photo).~~ Further, Mr. Jacobs indicated that customers signed a form that certified that materials brought to any of ~~their the SIMS~~ facilities were free of hazardous materials, including ODS/refrigerants. Mr. Cardonas showed the inspectors two signed papers that he claimed ~~was were~~ signed by people who brought trucks with scrap metal to them. ~~He said that they did not accept AC window units, as the sign at the weigh station indicated (see photo).~~

~~The SIMS representatives Mr. Cardonas~~ said that ~~they SIMS~~ did not shred the materials at this facility but transported the scrap materials to one of their facilities with a shredder, such as their Johnston, RI location, for further processing.

C. Record Review:

During the inspection, the inspectors did not review any written records except the two signed papers from people who brought refrigerators to this SIMS location.

D. Plant Walk-through:

The inspectors did not perform a walk through at this facility because it seemed to be a collection site.

Photos taken by the inspectors during the walk-through are located in the electronic file.

E. Closing Conference:

After very quick ~~meeting closing conference with the SIMS' representatives~~, the

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inspectors thanked Mr. Cardonas and Mr. Jacobs for their time and assistance and departed the site. -